## united states district court southern district of florida 22-20521-CR-SCOLA/GOODMAN

IN RE SEALED INDICTMENT

**MOTION TO SEAL** 

Nov 2, 2022

ANGELA E. NOBLE CLERK U.S. DIST. CT.

The United States of America, by and through its undersigned DOJ Trial Attorney, respectfully requests that the Indictment, arrest warrants and any resulting order be SEALED until the arrest of the first defendant or until further order of this Court, excepting the United States Attorney's Office and any relevant law enforcement agency, which may obtain copies of the Indictment, arrest warrants, or other sealed documents for purposes of arrest, extradition, or any other necessary cause, for the reasons that some of the named defendants may flee, the safety of the arresting officers could be compromised, and the integrity of an ongoing investigation may be compromised should knowledge of this Indictment become public. The DOJ Trial Attorney is prepared to provide further information *in camera* should the Court so require.

Respectfully submitted,

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By:

CHRISTOPHER FENZON

DOJ Trial Attorney

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